

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE :**

**MILDRED FIGUERAS FIGUEROA**

**Debtor(s)**

**CASE NUMBER: 09-02380 SEK**

**CHAPTER 13 (ASSET CASE)**

**DEBTORS REPLY TO FIRSTBANK PUERTO RICO  
MOTION FOR RELIEF OF STAY UNDER 362**

**TO THE HONORABLE COURT:**

COMES now Debtor(s) represented by the undersigned counsel and respectfully Allege(s) and Pray(s) as follows:

1. That on March 14th, 2011, the creditor Firstbank Puerto Rico filed a Motion for Relief From Stay Under 362 based on the fact that debtor was in arrears in the first mortgage loan in the amount of \$1,248.76.

2. Debtor made two of the five payments in arrears and will be cure the remaining three payments through a Post Confirmation Modification, debtor will include the current month of March in the plan.

3. Based on the abovementioned, it is debtor's contention that Firstbank Puerto Rico motion turns into a moot one.

**WHEREFORE**, it is respectfully requested from this Honorable Court to GRANT the present Motion, therefore deny Firstbank Puerto Rico Motion for Relief of Stay under 362.

**MILDRED FIGUERAS FIGUEROA**  
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**DEBTORS REPLY TO FIRSTBANK PUERTO RICO**  
**MOTION FOR RELIEF OF STAY UNDER 362**

In San Juan, Puerto Rico, this 22nd, day of March, 2011.

**RESPECTFULLY SUBMITTED**

**/S/Marilyn Valdes Ortega**

**MARILYN VALDES ORTEGA**

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Case No. 09-02380 SEK

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

09-02380 SEK Notice will be electronically mailed to:

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I HEREBY CERTIFY: That I have mailed by regular mail to all creditors listed.  
09-02380 SEK Notice will not be electronically mailed to:

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